UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE SUITE 1200
DALLAS TX 75202 2733

CERTIFIED MAIL RECEIPT # P-360-177-077

May 16 1997

Mr Benny Webb
Arkansas Terminaling & Trading
Route 1 Box 67A Central
North Little Rock AR 72117

RE FRP/SPCC/EPCRA Inspection Report
Arkansas Terminaling & Trading
FRP-06-AR-00042
FY-970013

Dear Mr Webb

On March 27 1997 representatives of the U S Environmental Protection Agency (EPA) conducted an Oil Pollution Prevention (40 CFR Part 112) inspection The inspection included a Facility Response Plan (FRP) Spill Prevention Control and Countermeasure (SPCC) and Emergency Planning and Community Right-to-know Act (EPCRA) compliance review for the above named facility During the compliance review the following deficiencies were noted

FACILITY RESPONSE PLAN

[For specific deficiencies see Attachment A FRP/SPCC/EPCRA Inspection Summary and Attachment B Facility Response Plan Checklist]

The facility owner/operator has not implemented the requirements as per section 4202(a)(5)(E)(ii) of the Oil Pollution Act of 1990 as codified in 40 CFR Part 112 20 due to the deficiencies listed below

- FRP not consistent with NCP/ACP as required by 40 CFR Part 112 20 (g)
- Contents of FRP are not consistent with model plan as required by 40 CFR Part 112 20 (h) See Attachment B FRP Checklist
- Inadequate or no emergency response information as required by 40 CFR Part 112 20 (h)(3)
- Insufficient or no information regarding hazard evaluation as required by 40 CFR Part 112 20 (h)(4)

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- Inadequate or no discussion of response planning levels as required by 40 CFR Part 112 20 (h)(5)

- Inadequate or no discussion of plan implementation as required by 40 CFR Part 112 20 (h)(7)

- Inadequate or no self inspection drills/exercises or response training as required by 40 CFR Part 112 20 (h)(8) See Attachments D Training Reference for Oil Spill Response and E Spill Response Drills/Exercises

- Inadequate or no site plan or drainage plan diagrams as required by 40 CFR Part 112 20 (h)(9)

SPILL PREVENTION CONTROL AND COUNTERMEASURE

[For specific deficiencies see Attachment A FRP/SPCC/EPCRA Inspection Summary and Attachment C SPCC Checklist]

SPCC plan inadequately implemented as required by 40 CFR Part 112 3 due to the deficiencies listed below

- Incomplete or no personnel training and spill prevention procedures as required by 40 CFR Part 112 7(e)(10)

ONSHORE FACILITIES (EXCLUDING PRODUCTION)

- Inadequate facility transfer operations pumping and in-plant processes [40 CFR Part 112 7 (e)(3)] (ii) not in service or extended standby transfer points capped or blank flanged and marked as to origin

EMERGENCY PLANNING AND COMMUNITY RIGHT TO-KNOW ACT

- No deficiencies were identified under EPCRA The facility had filed the proper chemical inventory reports (Tier II) under EPCRA for the preceding calendar year at the time of the notice of inspection

According to Section 4301(b) of the Oil Pollution Act (OPA) owners or operators of facilities subject to Part 112 who violate the requirements of this part 112 by failing or refusing to comply with any of the provisions shall be liable for a civil penalty of up to $25 000 for each day such violation continues

Please provide to this office within 30 days of the date of receipt of this report information photographs etc as necessary to clearly demonstrate that the above deficiencies have been

corrected or provide a firm schedule for achieving compliance with the oil pollution regulations A copy of 40 CFR Part 112 has been enclosed with this report If no response is received within 30 days potential enforcement actions may follow Please provide your response to

Karen McCormick (6SF RP)
Environmental Protection Agency
1445 Ross Avenue
Dallas Texas 75202 2733

If you have any questions regarding this correspondence please contact Karen McCormick at (214) 665-8365

Sincerely

Donald P Smith
Senior On Scene Coordinator (6SF-RP)
(214) 665-6489

Attachments

A FRP/SPCC/EPCRA Inspection Summary
B FRP Checklist
C SPCC Checklist
D Training for Oil Spill Response
E Spill Response Drills/Exercises
F 40 CFR Part 112

I BACKGROUND

Arkansas Terminaling & Trading (AT&T) is a bulk storage and distribution facility for petroleum products AT&T is owned by the Truman Arnold Company of Texarkana Texas The facility consists of nine aboveground storage tanks (ASTs) with the largest tank having a capacity of 75 000 barrels (bbls) The total capacity of the facility is approximately 234 380 bbls with an average daily throughput of 26 000 bbls The containment capacity of the earthen berm surrounding the ASTs is 95 000 bbls

The geographic coordinates of the facility were determined to be at Latitude 34°46'39" North Longitude 92°10'50" West by using portable Global Positioning System (GPS) equipment (model Trimble Scout) at the front gate of the facility

Below is a chronology of Facility Response Plan (FRP) and Spill Prevention Control and Countermeasure (SPCC) Plan submission

Date FRP received	9-9-93
FRP review letter written	2-18 94
Receipt of FRP revisions	4-94 1-27 95 3-14-97
Date of statutory approval	Not approved
SPCC plan receipt	3-27-97
Date of inspection	3-27-97

II INSPECTION ATTENDEES

EPA
Karen McCormick

EPA Superfund Technical Assessment and Response Team (START)
Tom Cochill
Julian Myers
David Crow
Rajeev Mathew

Facility Representatives
Benny Webb - QI Director of Terminal Operations
Rick Shingleur - Environmental Manager
Bill House - Terminal Manager

III INSPECTION SUMMARY

On March 27 1997 an EPA inspection team conducted an FRP/SPCC/EPCRA Compliance Inspection of the Arkansas Terminaling & Trading facility The inspection was conducted for the purpose of determining compliance with the Clean Water Act (CWA) as amended by the Oil Pollution Act of 1990 (OPA) and the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) regulations The inspection team met with Benny Webb - QI, Director of Terminal Operations Rick Shingleur - Environmental Manager and Bill House - Terminal Manager OSC McCormick explained to the facility representatives the purpose and jurisdiction of the inspection

OSC McCormick and inspection team member Cochill conducted the SPCC/FRP interview with Mr Webb the Qualified Individual (QI) and Mr House Inspection team members Myers Crow and Mathew conducted the field portion of the FRP/SPCC/EPCRA interview/inspection accompanied by Mr Shingleur which included photographic and written documentation of site conditions

The SPCC/FRP team inspected the several components of the AT&T facility These included the secondary containment outfalls product storage tanks pipeline manifolds the tank truck loading rack inspection records the response equipment and the out-of-service tanks in the NE area of the secondary containment

The following records were reviewed as part of this compliance inspection training logs equipment logs tank logs drill logs etc

The Inspection team reviewed the most current FRP after the inspection The FRP review checklist indicating missing and/or incomplete information is included as Attachment B

The Inspection team obtained a copy of the facility SPCC plan while on-site and conducted a plan review upon returning to the office The SPCC checklist is included as Attachment C

IV SUMMARY OF FINDINGS

As a result of the inspection the following deficiencies were identified and are included in the FRP/SPCC/EPCRA Inspection Report

FACILITY RESPONSE PLAN

The facility owner/operator has not implemented the requirements as per section 4202(a)(5)(E)(ii) of the Oil Pollution Act of 1990 as codified in 40 CFR Part 112 20 due to the deficiencies listed below

- FRP is not consistent with NCP/ACP as required by 40 CFR Part 112 20 (g) NCP/ACP require coordination mitigation communication containment and removal constituents

- Contents of plan are not consistent with model plan as required by 40 CFR Part 112 20 (h) or its equivalent See Attachment B FRP Checklist appendix F All items in appendix F must be addressed or stated as non-applicable

- Inadequate or no emergency response information as required by 40 CFR Part 112 20 (h)(3) Incomplete response equipment list See section 1 3 2 of the FRP checklist Incomplete response equipment testing and/or drill logs see section 1 3 3 of the FRP checklist Incomplete response personnel information see section 1 3 4 of the FRP checklist Incomplete evacuation plans see section 1 3 5 of the FRP checklist

- Insufficient or no hazard evaluation information as required by 40 CFR Part 112 20(h)(4) Incomplete analysis of oil spill effects on vulnerable areas See section 1 4 2 of the FRP checklist

- Inadequate or no discussion of response planning levels as required by 40 CFR Part 112 20 (h)(5) Incomplete or no description of small and/or medium discharge scenarios see section 1 5 1 of the FRP checklist Incomplete or no description of worst case scenario see section 1 5 2 of the FRP checklist

- Inadequate or no discussion of plan implementation as required by 40 CFR Part 112 20 (h)(7) Disposal plans incomplete see section 1 7 2 of the FRP checklist

- Inadequate or no self inspection drills/exercises, and response training as required by 40 CFR Part 112 20 (h)(8) Incomplete description of facility drills exercises and/or logs see section 1 8 2 of the FRP checklist Incomplete description of response training and/or logs see section 1 8 3 of the FRP checklist Facility did not follow PREP or have an equivalent program See Attachments D Training for Oil Spill Response and E Spill Response Drills/Exercises

- Inadequate site diagrams as required by 40 CFR Part 112 20 (h)(9) Incomplete information on Site Plan Drainage Plan and/or Evacuation Plan diagrams see section 1 9 of the FRP checklist

SPILL PREVENTION CONTROL AND COUNTERMEASURE

SPCC plan inadequately implemented as required by 40 CFR Part 112 3 due to the deficiencies listed below

- Incomplete or no personnel training and spill prevention procedures as required by 40 CFR Part 112 7(e)(10)

ONSHORE FACILITIES (EXCLUDING PRODUCTION)

- Inadequate facility transfer operations pumping, and in-plant processes [40 CFR Part 112 7 (e)(3)] (ii) not-in-service or extended standby transfer points capped or blank flanged and marked as to origin

EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT

- No deficiencies were identified under EPCRA The facility had filed the proper chemical inventory reports (Tier II) under EPCRA for the preceding calendar year at the time of the notice of inspection

V ADDITIONAL COMMENTS AND RECOMMENDATIONS

Based on the operational interviews and field inspection the following are recommendations which may improve or enhance the response capability for this facility

- You should discuss command and control operations (incident command system/unified command system) with your spill response contractor Command center accommodations and communications during a spill should be identified and stated in the FRP

- It is recommended that you contact your spill response contractor regarding spill mitigation procedures This includes mechanical methods to be employed by spill cleanup contractor

- It is recommended that recognized training for spill prevention and response be scheduled and implemented for response personnel

- If any fuel oil ASTs are to be decommissioned the procedures stated in the proposed SPCC regulations under the definition of permanently closed tank should be used [40 CFR Part 112 2(o)]

- It is recommended that the QI be provided with a pager or other form of communication so that he is accessible 24 hours a day

- It is recommended that gripper caps be placed on all monitoring wells

ATTACHMENT B

FRP CHECKLIST

ATT
3/27/97

FACILITY RESPONSE PLAN
INTERVIEW CHECKLIST

FACILITY @ 4 people

Hours of Operations	☐ 8 hrs	☐ 10 hrs	☐ 12 hrs	☒ 24 hrs
Work Week	☐ weekend	☐ flex week	☐ 5 day	☒ 7-day

DAY 8 5 M-F (3 Shift Mid-8 M-F)

2nd Shift Evening 5-Mid M-F (3 part-time weekends rotating)

TANKS Operation 80's

API 650
API 653

SCENARIO
Demonstrates knowledge of the plan

☐ Plan ☐ EPA

(receiving 2 hrs be present) Daily walk-around
loading RACKS/Perimeters
(24 HR Truck loading rack)

DISCOVERY
Means of spill detection

Facility Personnel	☐ none	☐ weekly	☒ daily	☐ hourly
Automatic	☐	☐ audio	☐ visual	
Manual	☐	☐ audio	☐ visual	
Offsite	☐	☐ residential	☐ commercial	

Hi Alarms in process Jet TANKS

IN - PIPELINE OUT - TRUCK

ASSESSMENT (QI Duties)
Exhibits knowledge of the following

☒ amount 305 000 bbls	☒ distance (downgradient soil water) Fence line	☐ time
SW ☒ directions	☒ material gasoline, diesel Jet fuel	☒ sensitive/vulnerable areas wetlands
☒ hazards imposed residents	☐ source	☒ cause (& chain reaction) YES
SW ☒ topography (pathway) marshy/stagnet water	☒ site conditions (soils impact) sand ontop Red clay 4 5	☒ resources deployed (response & removal actions) small spills
☐ climate conditions		

(#6/7 HDP liners | leak detections)

NOTIFICATIONS
(when where what how much)

☒ Internal (company) (communication equip)
QI's
President Craig Arnold

☒ External (agencies)
911
State
FED

☒ Contractor
(SPILLTECH
MOBLEY
NRC)

MITIGATION
Exhibits knowledge of the following

Resources — ☒ personnel — ☐ contractor

Mechanical
Sorbents pads

- ☒ ☐ boom (size/amount) — ☐ ☐ skimmers — ☒ ☐ vacuum trucks
- ☐ ☐ tractors — ☐ ☐ boats — ☐ ☐ sorbents (type/year)
- ☒ hand tools — ☐ equip checklist & test logs
- ☐ operational status — ☐ fire fighting equip

Chemical/Biological
Dispersants

- ☐ ☐ knowledge of products — ☐ ☐ nature of application
- ☐ ☐ knowledge of authorizations — ☐ operational status

Burning/Other mitigating devices

☐ knowledge of products — ☒ ☐ nature of application — ☒ ☐ knowledge of authorizations

TEMPORARY STORAGE
Have plans for the following

Coop site ok

	drums	tanks	pits	n/a
☒ on site	☐	☐	☐	☐
☒ off site	☐	☐	☐	☐
☐ contractor	☐	☐	☐	☐
☐ regulatory requirements	☐	☐	☐	☐

BFT -

TREATMENT
Exhibiting knowledge of the following

☒ reclamation ☒ land farming

DISPOSAL
Exhibits knowledge of the following

☒ disposal plans ☒ waste streams ☒ waste facilities ☒ regulatory requirements

veg
soils
products

ROLES AND RESPONSIBILITIES
Exhibiting knowledge of the following

☒ QI ☒ local ☒ state ☒ federal ☒ media

S;H
Assess
Notification
policy

COMMAND & CONTROL (ICS & UCS)
Familiarity with the following

☒ logistics ☒ operations ☒ planning ☒ financial
☒ internal ☒ external ☒ contractor

Terminal

COMMAND CENTER
Planning for or having knowledge of the following

☒ accommodations ☒ communications

No other site alt communications

TRAINING
Exhibiting knowledge in the following

☐ planning ☑ spill response ☒ safety ☒ prevention ☐ equipment

☐ training logs

SOPs / FRP } YES

* HAZWOPPER - NO
OILSPILL TRAINING -

EXERCISING
Has participated in or has knowledge of

☑ PREP ☐ other (please specify)_____ ☐ approved by RA

☐ Schedule ☐ Activity ☐ drill/exercise logs

☐ Based on training & drills/exercises is the facility able to implement plan?

Q1

EVACUATION
Exhibits knowledge of or participated in

	audio		visual
☐ internal	☐	Hey You	☐
☐ external	☐		☐

Take note of following

SW

☑ spill hazards	☑ check in area	☑ arrival routes of responders
☑ prevailing winds	☑ command center	☑ evacuation route (& alternate)
☐ alarm locations	☐ facility shelter	☒ community evacuation

HQS

RECOMMENTATION

GENERAL COMMENTS

CONTRACT/SPILL PATHWAY — EXERCISES Q1 SMT EQUIPMENT
TRAINING - OIL/HAZWHOPPER HQS — TAIKING FD EVACUATION
LAMINATED CARD — DISPOSAL PLANS - WASTESTREAM
STORAGE - VALT — FACILITIES
OFFSITE COMMAND CENTER — COMMUNICATIONS - QT's

NEED TANK CHECK BOXES

ATTACHMENT C

SPCC CHECKLIST

EPA Tank Id 3 Facility Tank Id 3

Max Cap (gal) 1 090 000 Safe Fill (gal) 1 034 500 Avg Qty (gal)

Tank Dia (ft) 92 5 Tank Hgt (ft) 40 Year Built 1980

Material(s) Stored in Tank

Material Name	CHRIS	CAS No	DOT No
Premium Gas			

Tank Age

- [ ] prior to 1920
- [ ] 1920 1945
- [ ] 1946 1960
- [ ] 1961 1975
- [x] 1976 1995

Tank Type

- [ ] Coned Roof (Vented)
- [ ] Coned Roof (Not Vented)
- [ ] External Floating Roof
- [x] Internal Floating Roof
- [ ] Geodesic Dome
- [ ] Spheriod
- [ ] Hemispheroid (Noded)
- [ ] Hemispheroid (NOT Noded)
- [ ] Vertical Cylindrical
- [ ] Fixed Roof (Vented)

Other

Tank Material

- [x] Single wall steel
- [ ] Double wall steel
- [x] Painted
- [ ] Non Painted
- [ ] Fiberglass reinforced plastic
- [ ] Composite (steel with fiberglass)
- [ ] Wooden

Other

Tank Construction

- [ ] Bolted
- [ ] Rivetted
- [x] Welded
- [ ] Shop Fabricated
- [ ] Field Erected

Tank Cathodic Protection

- [ ] None
- [ ] Sacrificial Anode(s)
- [x] Impressed Current

Check Tank including the base for leaks specifically looking for

Drips weeps & stains

- [x] Adequate
- [ ] Inadequate

Localized dead vegetation

- [x] Adequate
- [ ] Inadequate

Puddles of stored material

- [x] Adequate
- [ ] Inadequate

Discoloration of tank

- [x] Adequate
- [ ] Inadequate

Corrosion

- [x] Adequate

EPA Tank Id 3 Facility Tank Id 3

Corrosion

☐ Inadequate

Cracks

☒ Adequate

☐ Inadequate

Release Prevention Barriers

☐ Double Bottom

☐ Double walled

☐ Lined Interior

☐ Polyethylene Jacket

☐ Excavation Liner

☒ None

☐ Unknown

Other

Tank Liner

☒ None

☐ Internal (Double Bottom)

☐ Internal (Resin Coating)

☐ External (Fiberglass resin)

☐ External (Non Fiberglass resin)

Tank Safe Fill and Shutdown Procedures

☒ Visual Liquid Level

☐ Computerized Liquid Level

☐ No Liquid Level

☐ High Alarm/Shutdown

☐ High High Alarm/Shutdown

☐ No Alarm/Shutdown

☐ Audible Alarm

☐ Visual Alarm

☐ Computer Monitored Alarm/Shutdown

Release Detection Method

☐ Groundwater Monitoring

☐ Low Level Alarm

☒ Visual Monitoring

☐ Vapor Monitoring

☐ Interstitial Monitoring

☐ None

Other

Foundation Material

☒ Earthen Material

☐ Ring Wall

☐ Concrete (w/impermeable mat)

☐ Concrete (w/o impermeable mat)

☐ Steel

☐ Unknown

Other

Check Foundation (mark if present)

Cracks

☒ Adequate

☐ Inadequate

Settling

☒ Adequate

☐ Inadequate

Gaps (between tank and foundation)

☒ Adequate

☐ Inadequate

Puddles of stored material

☒ Adequate

☐ Inadequate

Discoloration

☒ Adequate

☐ Inadequate

Tank Piping Construction

☐ Aboveground

☒ Underground

EPA Tank Id 3 Facility Tank Id 3

Tank Piping Construction

- [ ] Steel (bare)
- [x] Steel (painted)
- [ ] Steel (galvanized)
- [ ] Double walled
- [ ] Copper
- [ ] Fiberglass Reinforced Plastic
- [ ] Unknown

Other

Check pipe/valves (mark if present)

Leaks at joints seams valves

- [x] Adequate
- [ ] Inadequate

Discoloration

- [x] Adequate
- [ ] Inadequate

Corrosion

- [x] Adequate
- [ ] Inadequate

Pooling of stored material

- [x] Adequate

Pooling of stored material

- [ ] Inadequate

Bowing of pipe

- [x] Adequate
- [ ] Inadequate

Localized dead vegetation

- [x] Adequate
- [ ] Inadequate

Ground saturated with stored material

- [x] Adequate
- [ ] Inadequate

Secondary Containment Types

- [x] Dikes/berms/retaining walls
- [ ] Curbing
- [ ] Culverts and/or gutters
- [ ] Spill diversion ponds
- [ ] Sorbent Materials
- [ ] Retention ponds
- [ ] Weirs and/or booms

Other Loc

Secondary Containment Checklist

- [ ] Capacity does not appear to be adequate?
- [ ] Drainage mechanism manually operated?
- [ ] Not sufficiently impervious to stored materials?
- [ ] Presence of stored mat w/in dike or berm?
- [ ] Standing water within dike or berm?
- [ ] Debris within the dike or berm area?
- [ ] Erosion or corrosion of dike or berm (location)?

Containment Liner

- [ ] None
- [x] Low Permeability Soils (clay)
- [ ] Steel
- [ ] Soil bentonite mix
- [ ] Concrete (Bituminous)
- [ ] Concrete (Non Bituminous)
- [ ] Synthetic Membrane (Polyvinyl chloride)
- [ ] Synthetic Membrane (Cholrinated polyvinyl)
- [ ] Synthetic Membrane (Polyethylene)
- [ ] Synthetic Membrane (Butyl rubber)
- [ ] Synthetic Membrane (Neoprene)
- [ ] Synthetic Membrane (Ethylene propylene diene monomer)
- [ ] Synthetic Membrane (Cholorosulphonated polyethylene)
- [ ] Synthetic Membrane (Oil resistant polyvinyl chloride)
- [ ] Synthetic Membrane (Dupont elasticized polyolefin 3110)

EPA Tank Id 5 Facility Tank Id 5

Max Cap (gal) 3 360 000 Safe Fill (gal) 3 292 000 Avg Qty (gal)

Tank Dia (ft) 120 Tank Hgt (ft) 40 Year Built 1985

Material(s) Stored in Tank

Material Name	CHRIS	CAS No	DOT No
Unleaded Gas			

Tank Age

- [ ] prior to 1920
- [ ] 1920 1945
- [ ] 1946 1960
- [ ] 1961 1975
- [x] 1976 1995

Tank Type

- [ ] Coned Roof (Vented)
- [ ] Coned Roof (Not Vented)
- [ ] External Floating Roof
- [x] Internal Floating Roof
- [ ] Geodesic Dome
- [ ] Spheriod
- [ ] Hemispheroid (Noded)
- [ ] Hemispheroid (NOT Noded)
- [ ] Vertical Cylindrical
- [ ] Fixed Roof (Vented)

Other

Tank Material

- [x] Single wall steel
- [ ] Double wall steel
- [x] Painted
- [ ] Non Painted
- [ ] Fiberglass reinforced plastic
- [ ] Composite (steel with fiberglass)
- [ ] Wooden

Other

Tank Construction

- [ ] Bolted
- [ ] Rivetted
- [x] Welded
- [ ] Shop Fabricated
- [ ] Field Erected

Tank Cathodic Protection

- [ ] None
- [ ] Sacrificial Anode(s)
- [x] Impressed Current

Check Tank including the base for leaks specifically looking for

Drips weeps & stains

- [x] Adequate
- [ ] Inadequate

Localized dead vegetation

- [x] Adequate
- [ ] Inadequate

Puddles of stored material

- [x] Adequate
- [ ] Inadequate

Discoloration of tank

- [x] Adequate
- [ ] Inadequate

Corrosion

- [x] Adequate

EPA Tank Id 5 Facility Tank Id 5

Corrosion

- [ ] Inadequate

Cracks

- [x] Adequate
- [ ] Inadequate

Release Prevention Barriers

- [ ] Double Bottom
- [ ] Double walled
- [ ] Lined Interior
- [ ] Polyethylene Jacket
- [ ] Excavation Liner
- [x] None
- [ ] Unknown

Other

Tank Liner

- [x] None
- [ ] Internal (Double Bottom)
- [ ] Internal (Resin Coating)
- [ ] External (Fiberglass resin)
- [ ] External (Non Fiberglass resin)

Tank Safe Fill and Shutdown Procedures

- [x] Visual Liquid Level
- [ ] Computerized Liquid Level
- [ ] No Liquid Level
- [ ] High Alarm/Shutdown
- [ ] High High Alarm/Shutdown
- [ ] No Alarm/Shutdown
- [ ] Audible Alarm
- [ ] Visual Alarm
- [ ] Computer Monitored Alarm/Shutdown

Release Detection Method

- [ ] Groundwater Monitoring
- [ ] Low Level Alarm
- [x] Visual Monitoring
- [ ] Vapor Monitoring
- [ ] Interstitial Monitoring
- [ ] None

Other

Foundation Material

- [x] Earthen Material
- [ ] Ring Wall
- [ ] Concrete (w/impermeable mat)
- [ ] Concrete (w/o impermeable mat)
- [ ] Steel
- [ ] Unknown

Other

Check Foundation (mark if present)

Cracks

- [x] Adequate
- [ ] Inadequate

Settling

- [x] Adequate
- [ ] Inadequate

Gaps (between tank and foundation)

- [x] Adequate
- [ ] Inadequate

Puddles of stored material

- [x] Adequate
- [ ] Inadequate

Discoloration

- [x] Adequate
- [ ] Inadequate

Tank Piping Construction

- [ ] Aboveground
- [x] Underground

EPA Tank Id 5 Facility Tank Id 5

Tank Piping Construction

- [ ] Steel (bare)
- [x] Steel (painted)
- [ ] Steel (galvanized)
- [ ] Double walled
- [ ] Copper
- [ ] Fiberglass Reinforced Plastic
- [ ] Unknown

Other

Check pipe/valves (mark if present)

Leaks at joints seams valves

- [x] Adequate
- [ ] Inadequate

Discoloration

- [x] Adequate
- [ ] Inadequate

Corrosion

- [x] Adequate
- [ ] Inadequate

Pooling of stored material

- [x] Adequate

Pooling of stored material

- [ ] Inadequate

Bowing of pipe

- [x] Adequate
- [ ] Inadequate

Localized dead vegetation

- [x] Adequate
- [ ] Inadequate

Ground saturated with stored material

- [x] Adequate
- [ ] Inadequate

Secondary Containment Types

- [x] Dikes/berms/retaining walls
- [ ] Curbing
- [ ] Culverts and/or gutters
- [ ] Spill diversion ponds
- [ ] Sorbent Materials
- [ ] Retention ponds
- [ ] Weirs and/or booms

Other Loc

Secondary Containment Checklist

- [ ] Capacity does not appear to be adequate?
- [ ] Drainage mechanism manually operated?
- [ ] Not sufficiently impervious to stored materials?
- [ ] Presence of stored mat w/in dike or berm?
- [ ] Standing water within dike or berm?
- [ ] Debris within the dike or berm area?
- [ ] Erosion or corrosion of dike or berm (location)?

Containment Liner

- [ ] None
- [x] Low Permeability Soils (clay)
- [ ] Steel
- [ ] Soil bentonite mix
- [ ] Concrete (Bituminous)
- [ ] Concrete (Non Bituminous)
- [ ] Synthetic Membrane (Polyvinyl chloride)
- [ ] Synthetic Membrane (Cholrinated polyvinyl)
- [ ] Synthetic Membrane (Polyethylene)
- [ ] Synthetic Membrane (Butyl rubber)
- [ ] Synthetic Membrane (Neoprene)
- [ ] Synthetic Membrane (Ethylene propylene diene monomer)
- [ ] Synthetic Membrane (Cholorosulphonated polyethylene)
- [ ] Synthetic Membrane (Oil resistant polyvinyl chloride)
- [ ] Synthetic Membrane (Dupont elasticized polyolefin 3110)